

**Fill in this information to identify the case:**

Debtor 1 William H. Handy, Jr.

Debtor 2 Allison Lorraine Handy  
(Spouse, if filing)

United States Bankruptcy Court for the: MIDDLE District of: PA  
(State)

Case number 5:14-bk-03360-RNO

Form 4100R

**Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

**Part 1: Mortgage Information**

Name of creditor: Beneficial Opportunity Fund, LLC Court claim no. (if known): 4

Last 4 digits of any number you use to identify the debtor's account: 3 0 1 4

Property address: 3182 Sunrise Lake  
Number Street

Milford PA 18337  
City State ZIP Code

**Part 2: Prepetition Default Payments**

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

**Part 3: Postpetition Mortgage Payment**

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 11/1/2019  
MM / DD / YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$
- c. **Total.** Add lines a and b. (c) \$

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

MM / DD / YYYY

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

**X** /s/ Danielle Boyle-Ebersole, Esquire Date 10/29/2019  
Signature

Print Danielle Boyle-Ebersole, Esquire Title Attorney  
First Name Middle Name Last Name

Company Hladik, Onorato & Federman, LLP

If different from the notice address listed on the proof of claim to which this response applies:

Address 298 Wissahickon Avenue  
Number Street  
North Wales, PA 19454  
City State ZIP Code

Contact phone ( 215 ) 855- 9521

Email debersole@hoflawgroup.com

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In Re:	: Bankruptcy No. 5:14-bk-03360-RNO
William H. Handy, Jr. and Allison Lorraine	: Chapter 13
Handy	:
Debtors	:
	:
Beneficial Opportunity Fund, LLC	:
Movant	:
vs.	:
	:
William H. Handy, Jr. and Allison Lorraine	:
Handy	:
Debtors/Respondents	:
and	:
Charles J. DeHart, III, Esquire	:
Trustee/Respondent	:

**CERTIFICATE OF SERVICE**

I, Danielle Boyle-Ebersole, Esq., hereby certify that I caused to be served true and correct copies of the **STATEMENT IN RESPONSE TO NOTICE OF FINAL CURE PAYMENT** at the respective last known address of each person set forth below on October 29, 2019:

Vern S. Lazaroff, Esquire  
Via Electronic Filing  
*Attorney for Debtors*

Charles J. DeHart, III, Esquire  
Via Electronic Filing  
*Trustee*

William H. Handy, Jr.  
Allison Lorraine Handy  
3182 Sunrise Lake  
Milford, PA 18337  
Via First Class Mail  
*Debtors*

Date: 10/29/2019

Respectfully Submitted,  
/s/Danielle Boyle-Ebersole, Esquire  
Danielle Boyle-Ebersole, Esquire  
Hladik, Onorato & Federman, LLP  
298 Wissahickon Avenue  
North Wales, PA 19454  
Phone 215-855-9521  
Fax 215-855-9121